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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Kathleen Denice Clippinger,

Plaintiff,

V.

United States of America ex rel United States Postal Service, et al.,

## Defendants.

Case No. 3:25-cv-00091-MMD-CLB

# Order Granting Stipulation to Extend Time to Answer (Second Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Kathleen Denice Clippinger, and the United States of America, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed her Complaint for Declaratory and Injunctive Relief on February 14, 2025. ECF No. 1.

Plaintiff personally served the United States with a copy of the Summons and Complaint on February 24, 2025.

The current deadline for the United States to respond to Plaintiff's Complaint is May 27, 2025.

On May 22, 2025, undersigned counsel for Plaintiff and the United States agreed to a 30-day extension of time for the United States to complete their review of the record, in order to accommodate the staffing shortages and relatedly substantial workload handled by undersigned AUSA. The standard for extending time is good cause. *See* FRCP 6(b)(1)(A).

1 Accordingly, the parties, through undersigned counsel, submit this stipulation for a  
2 30-day extension from May 27, 2025, to **June 27, 2025**, for the United States to file an  
3 answer or otherwise respond to the Complaint. This is the United States's second request  
4 for an extension of time.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 27th day of May 2025.

7 **Richard Harris Law Firm**

8 /s/ Joshua R. Dahan  
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12 *Attorneys for the Plaintiff*

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13 /s/ Virginia T. Tomova  
14 VIRGINIA T. TOMOVA  
15 Assistant United States Attorney

16 *Attorneys for the Federal Defendant*

17 **IT IS SO ORDERED:**

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19 UNITED STATES MAGISTRATE JUDGE

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DATED: May 27, 2025